

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION - DAYTON**

OLWIN METAL FABRICATION LLC, :
Plaintiff, : : **CASE NO: 3:22-CV-00333-WHR-PBS**
vs. : : **JUDGE WALTER H. RICE**
MULTI-CAM, INC., et al., : : **MAGISTRATE JUDGE PETER B.**
Defendants. : : **SILVAIN, JR.**
 : :

JOINT MOTION FOR STIPULATED PROTECTIVE ORDER

Pursuant to Fed. R. Civ. P. 26(c), Plaintiff, Olwin Metal Fabrication, LLC, and Defendants, MultiCam, Inc. and MultiCam Great Lakes, Inc. (collectively, “Movants”), by and through their undersigned counsel, hereby move this Court for the entry of the Stipulated Protective Order attached as Exhibit 1. In support of this Motion, Movants state as follows:

The Court is permitted to protect confidential information pursuant to Fed. R. Civ. P. 26, and good cause exists to enter the Stipulated Protective Order. Specifically, discovery in this case is likely to involve the disclosure by the Movants of proprietary, commercially sensitive and competitive information, and other confidential business and financial information that merits production under Fed. R. Civ. P. 26. The sensitivity of the information establishes good cause. *E.g., Carpenter v. Liberty Inc. Corp.*, S.D. Ohio No. 3:17-CV-228; 2018 WL 5115791, *3 (granting a protective order where “It [was] reasonable for [the movant] to seek a general protective order to protect its business records and proprietary information.”).

Counsel for the Movants have met and conferred and agreed upon the terms of the attached Stipulated Protective Order, and respectfully request that the Court enter the Stipulated Protective Order in the form set forth in Exhibit 1.

Respectfully submitted,

/s/Richard L. Carr, Jr. via email approval 8/21/23

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*/s/ Kathleen A. Fox per email approval
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CERTIFICATE OF SERVICE

The undersigned Counsel hereby certifies that, on August 21, 2023, the foregoing was served on the below-listed counsel via this Court's ECF system:

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